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Filing date: **03/31/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91177939
Party	Plaintiff Mir Rahim
Correspondence Address	WILLIAM L NIRO NIRO HALLER & NIRO 181 W MADISON ST , STE 4600 CHICAGO, IL 60602 UNITED STATES wniro@nshn.com
Submission	Request to Withdraw as Attorney
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Signature	/William L. Niro/
Date	03/31/2011
Attachments	Withdraw_Motion by Opposer.pdf (3 pages)(15601 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MIR RAHIM,	Mark:	CARDIO TENNIS HEART
Opposer,		PUMPING FITNESS (& Design)
v.	Serial No.:	78/646,142
TENNIS INDUSTRY ASSOCIATION,	Filed:	June 8, 2005
Applicant.	Opposition No:	91177939
	Examiner:	Tina Louis Snapp Law Office 116

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR OPPOSER, MIR RAHIM

William L. Niro, counsel for Opposer, Mir Rahim, moves this Court for leave to withdraw from employment as attorney for Opposer, Mir Rahim in these proceedings. Counsel for Opposer and Opposer have a fundamental disagreement with the conduct of the opposition and settlement negotiations such that professional considerations under the Illinois Code of Professional Responsibility require termination of the representation at this time.

Counsel and Opposer met in person on March 22, 2011, at which time counsel advised Opposer of his decision to withdraw. Counsel represents that he has recently discussed this matter with Opposer and Opposer consents to counsel's request to withdraw.

In furtherance of the withdrawal, counsel has taken reasonable steps to avoid any foreseeable prejudice to the rights of this client. Counsel for Opposer has assisted, and will continue to assist, Opposer in obtaining new counsel. Counsel has made available, and will continue to make available after withdrawal, all client papers and other litigation materials relevant to the proceedings.

This Motion is brought in good faith as necessary to comply with Counsel's professional obligations to the public and the practicing bar under the Rules of Professional Responsibility of the Illinois Supreme Court, and is not made to obtain an extension of time to which the Opposer would not otherwise be entitled.

A copy of this Motion is being served on Opposer by electronic mail transmission and Certified U.S. Mail-Return Receipt Requested as shown on the attached Certificate of Service.

For the foregoing reasons, counsel for Opposer requests that the Motion be granted and he be given leave to withdraw as counsel for Opposer in these proceedings.

Respectfully,

/s William L. Niro
William L. Niro
NIRO, HALLER & NIRO
181 W. Madison Street – Suite 4600
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wniro@nshn.com
Attorney for Opposer/Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR OPPOSER, MIR RAHIM** was served upon the following parties on March 31, 2011:

By Electronic Transmission:

Nathan J. Breen
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njb@howehutton.com
Attorney for Applicant/Defendant

By Electronic Transmission and Certified U.S. Mail-Return Receipt Requested:

Mir Rahim
7510 Tripp Avenue
Skokie, IL 60076
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/s/ William L. Niro